

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

AMANDA CIGANIK,	:	CASE NO.: 2:09-cv-00621
Plaintiff,	:	Judge William L. Standish
vs.	:	
GC SERVICES LIMITED PARTNERSHIP,:		
Defendant.	:	

**DEFENDANT'S MOTION TO COMPEL PLAINTIFF TO RESPOND TO
DEFENDANT'S DISCOVERY REQUESTS**

Now comes Defendant GC Services Limited Partnership ("Defendant"), by and through counsel, pursuant to Federal Civil Rule 37, and moves this Court for an order compelling Plaintiff to provide complete responses to Defendant's First Set of Interrogatories and Requests for Production of Documents. Pursuant to Federal Civil Rule 37(a)(1) and Local Civil Rules LCvR 7, 37.1, and 37.2, in an effort to secure the information and material without Court action, Defendant's counsel in good faith attempted to confer with Plaintiff's counsel to obtain discovery responses without success. The reasons for this Motion are more fully set forth in the following memorandum in support.

Respectfully submitted,

/s/ Mackenzie A. Baird

Robert J. Hannen
Pa. I.D. No. 63432
Mackenzie A. Baird
Pa I.D. No. 205687

THORP REED & ARMSTRONG, LLP
One Oxford Centre
301 Grant Street, 14th Floor
Pittsburgh, PA 15219-1425
412-394-7711
412-394-2555 (facsimile)
*Attorneys for Defendant GC Services
Limited Partnership*

MEMORANDUM IN SUPPORT

This Court should compel Plaintiff, pursuant to Federal Civil Rule 37, to provide complete and full responses to Defendant's First Set of Interrogatories and Requests for Production of Documents. In accordance with Local Rule 37.2, Defendant has attached its discovery requests as Exhibit A.

Defendant served Defendant's First Set of Interrogatories and Requests for Production of Documents upon Plaintiff on August 11, 2009. *See* Discovery Requests attached hereto as Exhibit A. Plaintiff failed to respond to a single discovery request. Defendant's counsel followed up with Plaintiff's counsel via email on September 17, 2009, October 13, 2009, and October 27, 2009 as to the status of Plaintiff's discovery responses. Attached hereto as Exhibits B, C, and D. Defendant also attached another copy of the discovery requests to its email of September 17, 2009 and October 13, 2009. *See* Exhibit B and C attached hereto. Plaintiff still did not provide responses even after Defendant served its responses to Plaintiff's discovery on October 27, 2009.

Defendant has made several attempts to avoid this Motion and obtain the requested information without Court action. *See* Exhibits B, C, and D attached hereto. Plaintiff has provided no response. Instead, Plaintiff has simply ignored Defendant's discovery requests.

Accordingly, GC Services Limited Partnership respectfully requests that this Court issue an order compelling Plaintiff to immediately provide complete responses to GC Services Limited Partnership's First Set of Interrogatories and Requests for Production of Documents.

Dated: November 24, 2009

Respectfully submitted,

/s/ Mackenzie A. Baird

Robert J. Hannen

Pa. I.D. No. 63432

Mackenzie A. Baird

Pa I.D. No. 205687

THORP REED & ARMSTRONG, LLP

Firm I.D. No. 282

One Oxford Centre

301 Grant Street, 14th Floor

Pittsburgh, PA 15219-1425

412-394-7711

412-394-2555 (facsimile)

rhannen@thorpreed.com

mbaird@thorpreed.com

Attorneys for Defendant GC Services

Limited Partnership

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing MOTION TO COMPEL PLAINTIFF TO RESPOND TO DEFENDANT'S DISCOVERY REQUESTS was served upon the following counsel of record via the Court's CM/ECF system on the same date of filing:

Jeffrey L. Suher, Esquire
4328 Old Wm. Penn Hwy., Ste. 2J
Monroeville, PA 15146
lawfirm@jeffcanhelp.com
Attorney for Plaintiff

/s/ Mackenzie A. Baird

Robert J. Hannen
Pa. I.D. No. 63432
Mackenzie A. Baird
Pa I.D. No. 205687

THORP REED & ARMSTRONG, LLP
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mbaird@thorpreed.com
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